

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

COBBLESTONE WIRELESS, LLC, <i>Plaintiff,</i> v. CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS <i>Defendant,</i>	<p>CASE NO. 2:23-cv-00382-JRG-RSP (Lead Case) JURY TRIAL DEMANDED</p>
COBBLESTONE WIRELESS, LLC, <i>Plaintiff,</i> v. AT&T SERVICES INC.; AT&T MOBILITY LLC; AT&T CORP., <i>Defendants,</i>	<p>CASE NO. 2:23-cv-00380-JRG-RSP (Member Case) JURY TRIAL DEMANDED</p>
COBBLESTONE WIRELESS, LLC, <i>Plaintiff,</i> v. T-MOBILE USA, INC., <i>Defendant,</i>	<p>CASE NO. 2:23-cv-00381-JRG-RSP (Member Case) JURY TRIAL DEMANDED</p>

—AND—

COBBLESTONE WIRELESS, LLC, <i>Plaintiff,</i> v. T-MOBILE USA, INC.,	<p>CASE NO. 2:22-cv-00477-JRG-RSP (Lead Case) JURY TRIAL DEMANDED</p>
--	---

Defendant,

NOKIA OF AMERICA CORPORATION,
ERICSSON INC.

Intervenors.

COBBLESTONE WIRELESS, LLC,

Plaintiff,

v.

AT&T SERVICES INC.; AT&T MOBILITY
LLC; AT&T CORP.,

Defendants,

NOKIA OF AMERICA CORPORATION,
ERICSSON INC.

Intervenors.

COBBLESTONE WIRELESS, LLC,

Plaintiff,

v.

CELLCO PARTNERSHIP d/b/a VERIZON
WIRELESS

Defendant,

NOKIA OF AMERICA CORPORATION,
ERICSSON INC.

Intervenors.

CASE NO. 2:22-cv-00474 -JRG-RSP
(Member Case)

JURY TRIAL DEMANDED

CASE NO. 2:22-cv-00478 -JRG-RSP
(Member Case)

JURY TRIAL DEMANDED

**DECLARATION OF REZA MIRZAIE IN SUPPORT OF PLAINTIFF'S OPPOSITION
TO MOTION TO CONSOLIDATE**

I, Reza Mirzaie, declare and state as follows:

1. I am a member of the State Bar of California, an attorney at the firm of Russ August & Kabat, and counsel of record for Plaintiff AlmondNet, Inc. in the above-captioned action. I submit this declaration in support of Plaintiff's Opposition to Motion to Consolidate. I have personal knowledge of the facts set forth herein, and if called upon to testify, could and would testify competently thereto.

2. In Cobblestone's infringement contentions served on March 13, 2022, the accused products in the Carrier 1 cases include (1) cellular base stations that support 3GPP 5G NR beamforming, handover between 4G and 5G NR wireless networks, or directional Supplementary Uplink (SUL) and/or Bandwidth Adaptation functionality, (2) cellular user equipment and Wi-Fi gateway devices that supports 3GPP 5G NR beamforming, and (3) cellular handsets, tablets, or smartwatches that support Wi-Fi-only automatic updates.

3. In Cobblestone's infringement contentions served on December 11, 2023, the accused products in the Carrier 2 cases include cellular base stations, mobile products, and services that support 3GPP carrier aggregation.

4. During the parties' meet and confers, Cobblestone made clear that it was amenable to putting the Carrier 2 cases on the same schedule as the Carrier 1 cases (rather than delaying the Carrier 1 cases eight months to put them on the same schedule as the Carrier 2 cases, which is what Defendants propose). Defendants rejected this proposal.

5. Defendants have not agreed to be bound by any decisions in the Samsung case.

6. The Carrier 1 and Carrier 2 cases were filed eight months apart. Trial in the Carrier 1 cases is set for September 2024. Trial in the Carrier 2 cases is set eight months later in May 2025. In the Carrier 1 cases, the parties have completed certain claim construction disclosures, fact

discovery is underway and set to close in under four months, and expert discovery is set to close in under five months. The Carrier 2 cases are in the pleading stage and claim construction disclosures are not even set to begin until July (after the close of expert discovery in the Carrier 1 cases).

7. Discovery has been open in the Carrier 1 cases since April 2023 and is set to close, in May 2024. Defendants and Intervenors Ericsson and Nokia have responded to numerous interrogatories and have produced hundreds of thousands of pages of documents. The parties have engaged in multiple rounds of discovery correspondence. Cobblestone's source code expert has conducted code reviewmultiple times. Discovery has just opened in the Carrier 2 cases.

8. The Carrier 1 cases focus on mobile devices pertaining to 5G beamforming or wifi-only automatic updates, while the Carrier 2 cases, focuses on mobile devices pertaining to 4G and 5G carrier aggregation.

9. Defendants also have not identified any technical witnesses in Carrier 2 to date.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 12, 2023, at Los Angeles, California.

/s/ Reza Mirzaie

Reza Mirzaie